

THE ROSEN LAW FIRM, P.A.

Laurence M. Rosen
One Gateway Center, Suite 2600
Newark, NJ 07102
Telephone: (973) 313-1887
Fax: (973) 833-0399
lrosen@rosenlegal.com

Lead Counsel for Lead Plaintiff and the proposed Class

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

MICHAEL VAN DORP,
INDIVIDUALLY AND ON BEHALF OF
ALL OTHERS SIMILARLY SITUATED,

Plaintiff,

v.

INDIVIOR PLC, SHAUN THAXTER,
MARK CROSSLEY, AND CARY J.
CLAIBORNE,

Defendants.

Case No. 2:19-cv-10792-ES-ESK

CLASS ACTION

**NOTICE OF MOTION AND
MOTION FOR ENTRY OF ORDER
PRELIMINARILY APPROVING
SETTLEMENT AND
ESTABLISHING NOTICE
PROCEDURES**

Motion Day: March 15, 2021

Hon. Esther Salas

PLEASE TAKE NOTICE that on March 15, 2021, or on a date to be set by this Court, Lead Plaintiff Michael Van Dorp (“Leap Plaintiff”), by his undersigned counsel, will move this Court, the Honorable Esther Salas, United States District Judge of the United States District Court for the District of New Jersey, at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07101, for entry of an Order: (i) preliminarily approving the settlement between Lead Plaintiff and Defendants Indivior PLC, Shaun Thaxter, Mark Crossley, and Cary J. Claiborne (“Defendants”); (ii) conditionally certifying the Settlement Class; (iii) approving the notice to the Class of the Proposed Settlement; and (iv) scheduling a final approval hearing for a date at the Court’s convenience.

In support of this motion, Lead Plaintiff relies on the accompanying Memorandum of Law, the Stipulation of Settlement and Exhibits thereto, the pleadings and records on file in this action, and other such matters as the Court may consider at the hearing on this motion.

Defendants do not oppose this motion.

Dated: February 9, 2021

Respectfully Submitted,

THE ROSEN LAW FIRM, P.A.

By: /s/ Laurence M. Rosen

Laurence M. Rosen

One Gateway Center, Suite 2600

Newark, NJ 07102

Tel: (973) 313-1887

Fax: (973) 833-0399

Email: lrosen@rosenlegal.com

and

Daniel Tyre-Karp (pro hac vice)

275 Madison Avenue, 40th Floor

New York, NY 10016

Tel: (212) 686-1060

Fax: (212) 202-3827

Email: dtyrekarp@rosenlegal.com

*Lead Counsel for Lead Plaintiff and the
Class*

CERTIFICATE OF SERVICE

I hereby certify that on February 9, 2021, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Laurence M. Rosen